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Tuesday, March 03, 2015

## VIA ECF & FACSIMILE

Hon. James B. Clark, U.S.M.J.  
United States District Court  
District of New Jersey  
United States Post Office and Courthouse  
1 Federal Square, Room 457  
Newark, New Jersey 07101  
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**RE: NIKE, INC. v. EASTERN PORTS CUSTOM BROKERS, INC., ET AL.**  
**Civil Action No. 11-CV-4390-CCC-JBC**

Dear Judge Clark:

This firm represents defendants City Ocean International, Inc. and City Ocean Logistics, Co., LTD (the "City Ocean Defendants") in the above-referenced matter. Currently pending before the District Court are respective Motions for Summary Judgment by the City Ocean Defendants and by plaintiff NIKE, Inc. ("Nike"). Also pending before the District Court is a Motion to Strike by Nike, filed on Friday, February 6, 2015. On behalf of the City Ocean Defendants and Nike, I am writing to request a one (1) week extension on all deadlines related to Nike's pending Motion to Strike (Docket No. 153) and a one (1) week extension on all parties' reply papers in connection with the pending Motions for Summary Judgment (Docket Nos. 143, 148 and 147). I have conferred with Michael Holihan, Esq., of Holihan Law, attorneys for Nike, on this date and he has consented to this request.

Applying the foregoing schedule modification extension to the current motion schedule results in the following requested briefing schedule:

1. The City Ocean Defendants' papers in opposition to Nike's Motion to Strike shall be filed no later than **Tuesday, March 10, 2015**;

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2. Reply papers by all parties with respect to *all* pending motions shall be filed no later than **Tuesday, March 24, 2015**; and
3. *All* pending motions shall be made returnable by the Clerk of the Court on **Tuesday, March 31, 2015**.

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Should the Court request a conference call to discuss this request, my office shall be more than happy to arrange it.

Thank you for your attention to this matter.

Respectfully submitted,



RICHARD A. CATALINA, JR.

cc: Michael Holihan, Esq. (via email)  
Safia A. Anand, Esq. (via email)  
Stephanie Boomershine, Esq. (via email)

RAC:li

SO ORDERED

*s/James B. Clark*

James B. Clark, U.S.M.J.

Date: *3/4/15*